Emergency Management Performance Grant (EMPG)

2016
State & Local Agreement (SLA)
PROCEDURES MANUAL

MONTANA
DISASTER AND EMERGENCY SERVICES
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I. Program Overview

What's New:

Here is what's new to the EMPG grant processes this year.
- Baseline requirements have changed slightly to include completion of a Federally mandated Grant Risk Assessment.
- All Work Plan activities must be tied to at least one core capability, and
- Grant applications, reports and ALL reimbursements will be completed online at fundingmt.org (see Appendix A for reference links and definitions)
- Screen shot instructions for application and Claim/Reimbursement are attached as Appendices

Established in 2016:

Here is what was established in the EMPG grant processes during 2015-16 year.
- Baseline requirements were identified,
- All Work Plan activities will now be tied to at least one core capability, and
- Grant applications and reports will be completed online at fundingmt.org (see Appendix A for reference links and definitions)

This guidance document is not intended to replace Montana Code Annotated (MCA), the FY 2016 EMPG Notice of Funding Opportunity (NOFO), 2 C.F.R. § 200, or the State-Local Agreement (SLA), but to highlight main points, give direction on requirements for EMPG eligibility, and provide useful examples. While there are certain disaster and emergency management obligations directed in MCA Title 10, work plans and projects may supplement and enhance statutory requirements.

Synopsis:

The purpose of the Emergency Management Performance Grant (EMPG) Program is to build a system of statewide emergency preparedness by providing Federal funds to allow for the integration of preparedness efforts that build, sustain, and deliver core capabilities and achieve the desired outcomes identified in the National Preparedness Goal (NPG; referred to as the Goal). The Department of Homeland Security expects EMPG recipients to prioritize grant funding to address identified capability targets and gaps. Recipients should prioritize the use of grant funds to maintain/sustain current capabilities, to validate capability levels, and to increase capability for high-priority core capabilities with low capability levels. See Appendix A for definitions of core capabilities, mission areas and solution areas.

Applications for EMPG grants are developed and submitted by county and tribal emergency managers. MT DES District Field Officers (DFOs) are available to provide technical assistance and support. EMPG recipients may only fund activities and projects that were included in their EMPG Program Work Plan submitted to and approved by the State Administrative Agency (SAA), Montana Disaster and

Emergency Services (MT DES). Program Work Plans will be assessed for their emergency management sustainment and enhancement efforts for building, sustaining, and/or delivering the core capabilities.

Local jurisdictions must equally match (cash or in-kind) EMPG funds. To meet matching requirements, grant recipient contributions must be verifiable, reasonable, allowable, allocable, and necessary under the grant program.

Conflict of Interest:

EMPG sub recipients are to disclose, in writing, any real or potential conflict of interest to MT DES, as the State Administrative Authority (SAA), as required by MT DES' conflict of interest policies, or any applicable state, local, or tribal statutes or regulations per the NOFO and 2CFR 200.112.

Certification Form: All employee's salaries and wages expected to work solely on a single EMPG Federal award or cost objective must be supported by certification that those employees worked solely on that program for the specified period of time. The key to determining whether an employee is working on a single cost objective is whether the employee's salary and wages can be supported in full from each of the Federal awards on which they work or from the Federal award alone if the employee's salary is also paid with non-Federal funds. Counties and Tribes will submit a signed Annual Certification Form (Attach in Web Grant application) along with their signed SLA on or no later than 32 October 2016 and anytime there are changes to the percentage or normal work hours per week charged to EMPG.

Personnel Action: Any time an EMPG-funded employee is hired, terminated, retired, receives a change in salary, or a promotion, etc., <u>MT DES must be notified within 30 days</u> or the following quarterly reimbursement may be delayed.

State & Local Agreement (SLA): The Emergency Management State and Local Agreement provides a single funding, operating, and reporting instrument for the accomplishment of agreed upon activities and products under the included performance activities to justify local funding assistance. The SLA, in particular, acknowledges that the MT DES State and Local Agreement applies to preparedness for natural and technological disasters as well as for attack that involves disaster preparedness (including prevention and protection), response, recovery and mitigation. Each Federal Fiscal Year (FFY) the MT DES will present the SLA to all participating jurisdictions. Jurisdictions that choose to participate will sign the SLA, thus acknowledging the objectives they are required to accomplish in the upcoming year. After each quarter, a progress reports must be submitted in Web Grants to their respective MT DES District Field Officer no later than the fifth day following the end of each quarter and then forwarded to the MT DES Office no later than the tenth day following the end of each quarter.

1. Each participating jurisdiction will sign their SLA with MT DES in October of each year. The SLA will be presented to participating counties/Tribal Nations at District or Regional meetings to be held annually in each region or as the SAA is able. This document outlines the objectives the jurisdiction has identified to accomplish in the upcoming Federal Fiscal Year (FFY). As soon as exact funding for the grant is identified

and/or if changes are required, our office will send an addendum to this signature page for your signature. The addendum must be signed before any funds will be reimbursed to the county/Tribe.

2. Failure of the County/Tribal Nation to accomplish and report the objectives set forth in their agreement, without justification and acceptance by MT DES, may subject the County/Tribal Nation to the withholding of any further funds provided under this agreement.   This also applies to the availability of the County/Tribal Emergency Manager's ability to complete 100% of the agreed/awarded requirements listed in the SLA, and maintaining an office schedule commensurate with their expected percentage of time worked for Emergency Management.

3. The normal process will be no more than three email requests with verbal follow-up for required information or reports. This will be followed by a formal letter from MT DES of non-performance and then formal notification in writing of placement on the High Risk Sub-grantee list. If a county/Tribal Nation is placed on a "High-Risk" status and or funding probation, the county/Tribal Nation will not receive any funding until 100% of all required performance reports and or SLA objectives are completed. If funds are withheld, the County/Tribal Nation will be placed on a "High Risk Sub-grantee" status and funding may be restricted or withheld the following year.

II. Program Performance Reporting

Recipients are required to submit various financial and programmatic reports as a condition of their award acceptance. Future awards and fund drawdowns may be withheld if these reports are delinquent or incomplete. Quarterly reports need to detail progress towards completing activities and projects approved in your EMPG Program Work Plans, how expenditures support maintenance and sustainment of current core capabilities, and the progress made towards implementing the National Preparedness System (NPS).

The development of projects from the Work Plan, and funds expended from the Budget, will be detailed in the Quarterly Progress (programmatic) Report and the Financial Report (with reimbursement request claims) as work progresses throughout the grant year. Quarterly Progress (programmatic) Reports are due into the fundingmt website by the dates listed below and should include the progress and status of all your Work Plan projects, all Training received/provided, and all Exercises attended/ conducted within the Quarter. After consultation with your MT DES DFO, Financial Reports/ Reimbursement Requests must be entered into the fundingmt.org website by the dates listed below. The deadlines are important in order to allow reporting activities to be completed within the timeframes mandated by FEMA. However, if a Due Date falls on a weekend or Holiday, the deadline is adjusted to the next business day.

Reporting Period	Progress Report Due Date	Financial Report Due Date
October 1 – December 31	January 5	February 15
January 1 – March 31	April 5	May 15
April 1 – June 30	July 5	August 15
July 1 – September 30	October 5	November 15

NIMS Reporting:

EMPG recipients must ensure and maintain adoption and implementation of the National Incident Management System (NIMS). NIMS compliance is reported to FEMA through MT DES annually.

Technical Assistance/ Claim Reimbursements:

EMPG recipients will be monitored programmatically and financially by MT DES to ensure that all activities and project goals, objectives, performance requirements, timelines, milestone completion, budgets, and other related program criteria are being met. Technical assistance shall be accomplished through either a desk-based review, on-site technical assistance visits, or both. Technical Assistance shall be accomplished by MT DES DFO's, MT DES Grant personnel, or a combination of both. Technical assistance may involve the review and analysis of the financial, programmatic, performance, compliance and administrative processes, policies, activities, and other attributes and will identify areas where technical assistance, corrective actions and other support may be needed.

Initial technical assistance/reimbursement claim reviews shall be conducted by MT DES District Field Officers (DFO) on a quarterly basis. DFOs, in conjunction with local/tribal DES coordinators, must review all expenditures to ensure they are allowable, allocable, and reasonable as set forth in the EMPG Notice of Funding Opportunity and other applicable Federal and State statutory guidance. To ensure all expenditures meet this criteria, MT DES DFOs must review all pertinent and necessary documentation (receipts, travel logs, soft match documentation, etc…) of local/tribal DES coordinators quarterly to ascertain correctness based on listed expenditures, as reflected in an approved general ledger. Upon determination of correctness, MT DES DFOs shall provide the initial approval of requested reimbursement claims in WebGrants, mark it as approved and forward it for review to MT DES grants personnel. MT DES grants personnel are then responsible for conducting second and third level reviews and approvals as designated by the State Administrative Authority (SAA).

Local/tribal DES Coordinators are responsible for the maintenance and storage of all pertinent local /tribal expenditure documentation for a period of not less than three years from the close of the grant period, or the most recent financial action (audit, etc.), as appropriate. This information is to be accessible for review by an authorized representative of the SAA upon request, per 2 CFR 200. Local/tribal DES coordinators are responsible for the uploading of general ledgers and soft match reporting documentation into the WebGrants system to facilitate review processes. As previously mentioned, all other documentation is the responsibility of local/tribal DES coordinators to be locally maintained for a period of not less than three years from the close of grant period, or the most recent financial action.

Accruals:

An accrual, as found in the Montana Operations Manual, is the recognition of expenditure activity prior to its actual receipt or disbursement. Accruals must be submitted to the SAA annually not later than the second week of June for approval.

Accruals, according to Montana Operations Manual Policy 375 require that all projected expenditures include the following before being considered: general criteria for valid obligations, supporting documentation, and accrual estimate for anticipated costs. Accrual procedures must meet Generally Accepted Accounting Principles (GAAP), which require that all expenditures be recognized in the accounting year accrued.

Valid accruable expenditures should include:

- Materials and supplies expended in the fiscal year in which they are received;
- Goods ordered but not received as of the fiscal year end if accompanied with a purchase order to verify date of order/purchase;
- Services rendered in the fiscal year which they were charged;
- Equipment charged against the fiscal year in which the purchase order was issued;
- Contracts or other legal commitments relate dot unperformed legally binding contracts in process at year end.

As with all other purchases all accruals must be accompanied by valid supporting documentation which must be submitted to the SAA upon request, prior to award of accrual funds.

"A" accruals are those accruals which have a valid PO to purchase items or contract for services to be received *AFTER* June 30th. "A" accruals must have supporting documentation in order to be accounted for.

"B" accruals, are goods or services received *BEFORE* June 30th where the payment (reimbursement) will not be made until the new state fiscal year.

Closeout:

MT DES, as the SAA, will close-out the EMPG award when it determines that all applicable administrative actions and all required work of the award have been completed by the award Recipients in accordance with 2 C.F.R. § 200.343. Final Reimbursement Requests and all reports, including exercise After Action Reports/Improvement Plans (AAR/IP) and a final performance progress report detailing all accomplishments and a qualitative summary of the impact of those accomplishments throughout the period of performance are due by November 15 of each year.

III. Program Elements:

Substantial work has been done by Montana Association of Disaster and Emergency Services Coordinators (MADESC), state agency partners, and Montana Disaster and Emergency Services (MT DES) to identify standards for emergency management programs and personnel in order to provide for the emergency and disaster prevention and preparedness and coordination of response and recovery decreed in MCA Title 10, Chapter 3 and the Emergency Planning and Community Right-to-Know Act (EPCRA), part of the federal Superfund Amendments and Reauthorization act (SARA Title III).

The elements listed below are the *minimum* requirements for participation in the EMPG Program:

- Maintain an emergency plan and program that is in accordance with, and in support of, the State's disaster and emergency plan, the Montana Emergency Response Framework (MERF), and the State program.

- Complete and record proof of completion of NIMS training, Independent Study (IS) 100, 200, 700, and 800, training. In addition, complete either the IS Professional Development Series or the National Emergency Management Basic Academy.

- EOP's must be reviewed, updated, and submitted to the SAA every two years, at a minimum.

- Designate a primary and alternate Emergency Operations Center (EOC)

- Develop and maintain a Resource List of personnel and equipment. Include contact information for public (municipal, county, tribal), private and volunteer personnel.

- Facilitate or participate in your Local Emergency Planning Committee (LEPC), Tribal Emergency Response Commission (TERC), or other all-hazards community planning group. Meeting minutes and membership lists are provided to the State Emergency Response Commission (SERC) via Montana DES. Working with your all-hazard community planning group:
    - Identify local preparedness and response partners and their roles and responsibilities
    - Identify facilities and location designated for emergency use
    - Routinely review and maintain the necessary emergency plans
    - Review your jurisdiction's Threat and Hazard Risk Assessment (THIRA)

- Develop a Training and Exercise Plan (TEP) for your jurisdiction

- All EMPG-funded personnel will participate in at least three exercises, as defined by the Homeland Security Exercise and Evaluation Program (HSEEP), within a twelve-month period. At least one exercise should be an operations-based exercise. Participating in or shadowing an ICS/EOC Command and General Staff position during a real-world event, when possible, is suggested. The exercise could be in collaboration with other agencies that also have a similar requirement and can be counted as one of the three exercises required for EMPG funding.

- o Complete an After Action Report/Improvement Plan (AAR/IP) within 90 days of the exercise or real world event and submit to MT DES.

- • Attend MT DES' Regional Meeting

- • Per 2CFR 200.205, prior to award, all sub recipients must submit a completed risk assessment. (This is different from the THIRA).

- • Have the following on file with MT DES:
  - o Oath of Office from Authority Having Jurisdiction (AHJ). Normally this is the Principle Executive Officer, e.g., Mayor, Tribal Chair, Commissioner.
  - o Letter of appointment from Authority Having Jurisdiction (Applicant Agent Letter)
  - o State/Tribal and Local Agreement (SLA)
  - o Information release authorization form with contact information
  - o Grant Risk Assessment
  - o Jurisdictional Emergency Operations Plan (EOP) signed by the Principle Executive Officer

These items should be uploaded to WebGrants prior to submittal of the initial quarterly programmatic reports, unless otherwise instructed. Additionally, it is required that all jurisdictions receiving EMPG funds actively participate in the THIRA/SPR process.

The items listed below are additional, *advanced* elements that should be completed to participate in the EMPG Program:

- • Review/update *Pre-Disaster Mitigation (PDM) Plan*

- • Prepare/facilitate an approved (by AHJ) Recovery plan/annex to EOP

- • Develop a personal training plan with MT DES DFO

- • Demonstrate working knowledge/proficiency of WebEOC

- • Yearly compliance review with MT DES DFO

The .pdf version of the Montana Disaster and Emergency Management Baseline signed by the Montana Association of Disaster and Emergency Services Coordinators and Montana Disaster and Emergency Services is available from MT DES.

Determining Local Projects:

The EMPG Program contributes to the implementation of the National Preparedness System (NPS) by supporting the building, sustainment, and delivery of core capabilities. EMPG Recipients will use the

components of the NPS cycle to inform decision making and resource allocation, and measure progress towards identified desired outcomes.
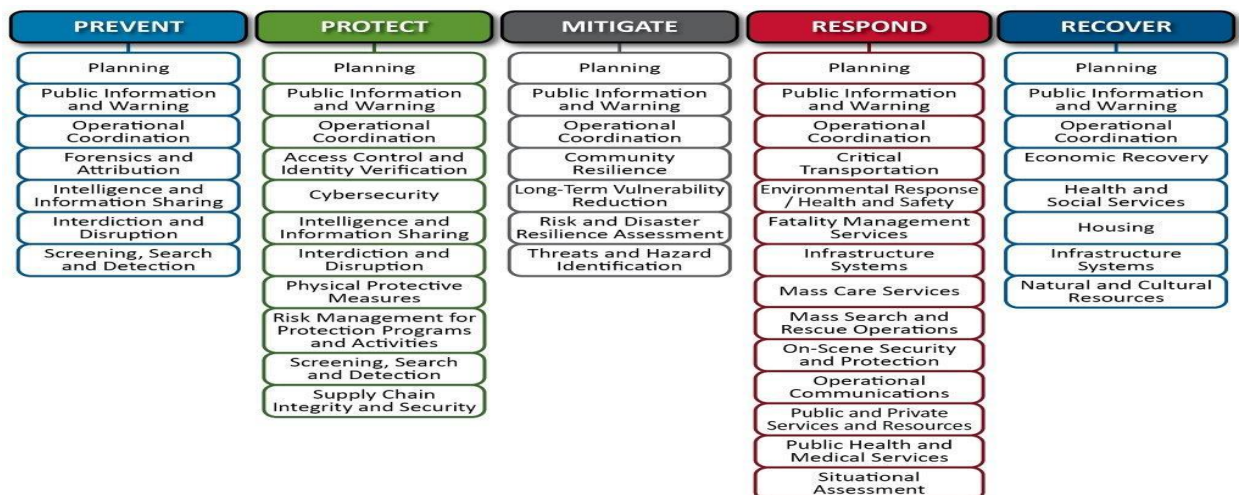
The steps of the cycle are:
1. Identifying and assessing risks
2. Estimating the level of capabilities needed to address those risks
3. Building or sustaining the required levels of capability
4. Developing and implementing plans to deliver those capabilities
5. Validating and Technical Assistance progress
6. Reviewing and updating efforts to promote continuous improvement

Core capabilities are essential for the execution of critical tasks for each of the five mission areas outlined in the Goal. Capabilities are "the means to accomplish a mission function, or objective based on the performance of related tasks, under specified conditions, to target levels of performance".[1] The EMPG Program's allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response, and Recovery mission areas. Mission Areas are composed of 5 themes identified in the Goal that comprise the parts of Preparedness.

All EMPG-funded activities in your Work Plan are to be tied to at least one core capability. Capabilities to focus your resources upon should be based on a risk assessment which takes into account the unique characteristics of your community, geographic location, and assets to determine your vulnerabilities to, and the consequences of, the most probable and impactful hazards. If your priority core capabilities aren't clear, one of the projects to consider for your Work Plan would be a Risk Assessment (Core Capabilities of Planning, Threats and Hazard Identification, Risk and Disaster Resilience Assessment, Risk Management for Protection Programs and Activities).

The Core Capabilities by Mission Area are:

PREVENT	PROTECT	MITIGATE	RESPOND	RECOVER
Planning	Planning	Planning	Planning	Planning
Public Information and Warning	Public Information and Warning	Public Information and Warning	Public Information and Warning	Public Information and Warning
Operational Coordination	Operational Coordination	Operational Coordination	Operational Coordination	Operational Coordination
Forensics and Attribution	Access Control and Identity Verification	Community Resilience	Critical Transportation	Economic Recovery
Intelligence and Information Sharing	Cybersecurity	Long-Term Vulnerability Reduction	Environmental Response / Health and Safety	Health and Social Services
Interdiction and Disruption	Intelligence and Information Sharing	Risk and Disaster Resilience Assessment	Fatality Management Services	Housing
Screening, Search and Detection	Interdiction and Disruption	Threats and Hazard Identification	Infrastructure Systems	Infrastructure Systems
	Physical Protective Measures		Mass Care Services	Natural and Cultural Resources
	Risk Management for Protection Programs and Activities		Mass Search and Rescue Operations	
	Screening, Search and Detection		On-Scene Security and Protection	
	Supply Chain Integrity and Security		Operational Communications	
			Public and Private Services and Resources	
			Public Health and Medical Services	
			Situational Assessment	

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[1] National Preparedness System, November 2011, Department of Homeland Security

Three core capabilities, Planning, Public Information and Warning, and Operational Coordination, span all five mission areas. These common core capabilities, in many ways, are necessary for the success of the remaining core capabilities. Additionally, a few core capabilities (Intelligence and Information Sharing; Interdiction and Disruption; Screening, Search and Detection; and Infrastructure Systems) are directly involved in more than one mission area and are listed in each mission area as appropriate.

IV. Application Guidelines

Application: General

Continuing this year, all grant applications and reports will be completed online at www.fundingmt.org. There are five sections of the application.

1. **FY 16-17 General Information**
2. **FY 16-17 Administrative and General Information**
3. **FY 16-17 EMPG Applicant Assessment**
4. **FY 16-17 EMPG Work Plan**
5. **FY16-17 Budget**

This Guidance is not intended to describe how to complete an application or report in WebGrants, but to explain certain sections of the application and give Work Plan project examples. EMPG application and reporting forms in fundingmt.org will be updated each year and are modifiable if glitches or errors are encountered.

The application establishes the foundation for the year's work and expenditures. Quarterly reports and reimbursement requests will be based on Work Plan activities and projects and Budget breakdowns. It is understood that predictions of future activities are not perfect. When changes need to be made, work with your DFO and the Grants Team through the normal procedures outlined in the current SLA.

Application: EMPG Work Plan (Scope of Work)

The Work Plan section of the application outlines the activities that will be funded by EMPG. The Quarterly Reports will detail the progress made on the activities in the Work Plan. It is highly probable there will be at least one work item or project from each one of the solution areas: Planning, Organization, Equipment, Training and Exercise. Of course, if there isn't any EMPG-funded activity in an area, i.e. if no equipment is being purchased this year or if all Training activities are being supported by a funding source other than EMPG, etc., then there is no need for an equipment or training project. However, as the participation in at least three exercises is an EMPG requirement, an Exercise project will be needed even if no EMPG funding is used towards the exercise activities.

The description of each Work Plan project will include the following:

- **Name of Planned Project -** Provide a descriptive name of each planned project. Examples include "Develop Emergency Function Annexes", "Evacuation Plan Update", "Conduct a Threat and Hazard Identification and Risk Assessment (THIRA)", "NIMS Training for EMPG Funded Personnel", "ICS Training for Emergency Response Personnel", or "Exercising of Sheltering Plan".

- **Core Capabilities Addressed -** Identify which of the 32 core capabilities (multiple can be selected) the project addresses.

- **Project's Objective/End State -** What is the desired outcome or result of the project? Briefly explain the major objective of the project, including how the project will address gaps identified through various assessments conducted.

- **Performance Milestones for Measurement and Evaluation -** Forecast activities and results per quarter that will be used to evaluate the progress of this project. The description should include a timeline.

The EMPG Program's allowable costs support efforts to build and sustain core capabilities across the Prevention, Protection, Mitigation, Response and Recovery mission areas. Examples of projects with tangible outcomes from your program can be found in Appendix B.

Application: FY16-17 EMPG Budget

The EMPG Program Budget contains sections based on the following categories, which encompass all of the Solution Areas, including Planning, Organization, Equipment, Training and Exercises (POETE). See Appendix A for Solution Area definitions. Each Solution Area is broken down into Travel, Supplies, Contractual, and other costs, when appropriate.

- **Planning**: Planning efforts should span all five mission areas – Prevention, Protection, Mitigation, Response and Recovery. The EMPG Program Work Plan should provide a baseline for determining potential threats and hazards, required capabilities, required resources, and establish a framework for roles and responsibilities. Planning efforts should also demonstrate the engagement of the whole community in the development of a strategic, operational, and/or community-based approach to preparedness.

  The *minimum* Planning requirements for participation in the EMPG Program are:
  - An Emergency Operations Plan (EOP) with the appropriate Annexes
  - An Evacuation Plan or Annex
  - An Inventory of Resources
  - A Training and Exercise Plan (TEP).

Recipients are to review/update their Emergency Operations Plan (EOP) every two years to comply with the Comprehensive Preparedness Guide (CPG) 101 v. 2, *Developing and Maintaining Emergency Operations Plans*. Recipients will communicate their compliance with this requirement through their Quarterly Reports and the submission of major EOP updates to MT DES.

Strong emergency management programs will develop, test, and maintain a number of plans, assessments and inventories. Suggested planning projects include:

Emergency Operations Plan	Communications Plan
EOP Annexes	Functional or Access Needs Plan
Continuity of Operations Plan	Hazardous Material Response Plan
Continuity of Government Plan	Mobilization (Resource) Plan
Evacuation Plan	Pre Disaster Mitigation Plan
Sheltering Plan	Housing Plan
Pet Evacuation and Sheltering Plan	Economic Recovery Plan
Volunteer & Donations Plan	Private/Public Partnership Plans
Threat and Hazard Identification & Risk Assessment	Multi-year Training and Exercise Plan
Preparedness Assessment	Mutual Aid Agreements / Memorandum of Understanding
Resources Management Plan and Inventory	

- **Organization**: EMPG Program funds may be used for all-hazards emergency management operations, staffing, and other day-to-day activities in support of emergency management. Enter each EMPG-funded employee's Salary and Benefits separately. Staffing costs do NOT need to be broken down by project in the application.

  Personnel costs, including salary, overtime, compensatory time off, and associated fringe benefits, are allowable costs with EMPG Program funds. These costs must comply with 2 C.F.R. Part 200, Subpart E – Cost Principles.

- **Equipment**: Allowable equipment categories for the EMPG Program are listed on the web-based version of the Authorized Equipment List (AEL). Unless otherwise stated, equipment is to meet all mandatory regulatory and/or FEMA-adopted standards to be eligible for purchase using these funds. In addition, agencies will be responsible for obtaining and maintaining all necessary certifications and licenses for the requested equipment.

  Equipment allowable for EMPG funding includes equipment from the following AEL categories:
  - Information Technology (Category 4)
  - Cyber security Enhancement Equipment (Category 5)
  - Interoperable Communications Equipment (Category 6)
  - Detection Equipment (Category 7)
  - Power Equipment (Category 10)
  - Chemical**,** Biological**,** Radiological**,** Nuclear**,** and Explosive (CBRNE) Reference Materials (Category 11)
  - CBRNE Incident Response Vehicles (Category 12)

• Physical Security Enhancement Equipment (Category 14)
• CBRNE Logistical Support Equipment (Category 19)
• Other Authorized Equipment (Category 21)

If Recipients have questions concerning the eligibility of equipment not specifically addressed in the AEL, they should contact the MT DES Grants staff who will work with their FEMA Regional Program Manager to get clarification.

- **Training**: EMPG Program funds may be used for a range of emergency management-related training activities to enhance the capabilities of emergency management personnel through the establishment, support, conduct, and attendance of training. Attendance at or facilitation of a training activity should be planned to enhance and improve gaps in a jurisdiction's priority core capabilities. Consistent with the *Whole Community* approach, and at the jurisdiction's discretion, personnel from private, non-profit, and other non-governmental organizations that would have a role in any phase of community emergency management are eligible to attend EMPG-funded trainings.

Training & Exercise Plan:

Jurisdictions shall develop a *TEP* that lists upcoming planned training and exercises. Whether drafted at a formal *Training & Exercise Planning Workshop* (TEPW) or created and updated through platforms such as the LEPC or informal working groups, the TEP should nonetheless list a progressive sequence of activities intended to meet gaps in priority core capabilities. The TEP, at a minimum, shall show planned activities for the upcoming twelve to eighteen months. The TEP will be updated as needed and reviewed at least semi-annually with your DFO, who will also use the TEP to identify common needs as well as opportunities for sharing exercise and training resources district-wide. As jurisdictions become more adept at long-range planning, a formal *Multi-year Training & Exercise Plan* should be considered which may show intended activities up to three years in the future. County & Tribal DES Coordinators are also encouraged to attend the Annual State of Montana *Training & Exercise Planning Workshop* which is held between January and March at Fort Harrison, Montana.

The TEP should neither be a complex instrument nor necessarily adhere to any specific format. Rather, it can be as simple as a one-page document. It should be considered a "living" plan, to be updated and reviewed to reflect changes in jurisdictional priority core capabilities; status towards progress in meeting identified gaps; and changes in funding, personnel, and availability of formal trainings.

SAMPLE Training & Exercise Plan – Hansen County – Updated 6/15/2016

Hansen County Priority Core Capabilities:

- Public Information & Warning
- Planning
- Operational Coordination
- Mass Care Services

Quarters of Calendar Year (CY)	Training	Exercises
July - September 2016	FEMA G290 *Basic Public Information Officer*	Public Warning Responsibilities Workshop – County Courthouse

	ICS-200 *ICS for Single Resources & Initial Action Incidents*	
October - December 2016	ICS-300 *Intermediate ICS*	City of Hobart Evacuation Notification -Tabletop Exercise
	Social Media Workshop	County EOC Activation Drill
January - March 2017	NWS *Weather Spotters Workshop*	Train Derailment – Public Information and Warning Drill – City of Hobart
		Train Derailment – Unified Command Tabletop Exercise
April - June 2017	FEMA G235 *Fundamentals of Emergency Planning*	Mass Sheltering Tabletop
	ICS-400 *Advanced ICS*	Johnstown Dam EAP Drill
July - September 2017	No training	Train Derailment – EOC Functional Exercise
October - December 2017	*Community Emergency Response Team* Training	Senior Officials Workshop: Review EOP Responsibilities

EMPG/Emergency Management Baseline-Required Training for DES Coordinators versus Jurisdictional Training Needs:

Jurisdictional training projects may assume two basic categories:

1) Those trainings required for DES Coordinators in accordance with the EMPG NOFO and the *Montana Disaster and Emergency Management Baseline*, outlined below, and

2) Trainings which the applicant desires to deliver to emergency management and allied audiences, such as first responders, private, non-profit and non-governmental organizations (NGOs) in their jurisdiction.

For example, the first training project may be "Complete EMPG-Required Professional Development Trainings", which will be the mechanism that allows the EMPG-funded applicant to attend and complete his/her own required trainings, such as the core *NIMS/ICS* and FEMA *Professional Development Series.*

If the applicant has identified (through a TEP, THIRA, needs analysis, etc.) additional training needs, these should be listed as a separate project designed to improve a specific core capability through a combination of planning, training, and/or exercises. The training may either be a hosted event designed for delivery to local audiences, or identify out-of-area trainings that the applicant wishes to attend. For example, *Mass Care Services* is identified as a priority core capability, and the jurisdiction lists "Build Mass Care Capability" as a Work Plan project. One milestone for the project could be hosting a *Basic Shelter Training for Volunteers* in partnership with a VOAD (Voluntary Agencies Active in Disaster).

Specific Training Requirements for EMPG-funded Personnel:

EMPG-funded personnel are to complete the following Level A trainings in accordance with timelines established by the *Montana Disaster and Emergency Management Baseline* and USDHS/EMPG requirements. It is understood that many EMPG applicants may only be funded to a 1/4 or 1/2 –time position and may have assumed the position with varying degrees of experience, thus the timeline for completion of selected trainings will be jointly determined and agreed upon by the MT DES DFO and applicant. Applicants should consult with their MT DES DFO to develop a personal training plan, with the intent of offering a clear pathway for the applicant's professional development.

V. EMPG: Personnel Funding Requirements

1. Level A - Initial (minimal) Requirements for all EMPG-funded personnel:

*All FEMA Independent Study (IS) courses are free and available on-line through FEMA's Independent Study portal, found at: https://training.fema.gov/is/crslist.aspx

"ICS," "G" or "MGT" prefixes indicate a field classroom offering.

- Complete four FEMA on-line Independent Study (IS) courses:

Course Series:	*Core NIMS/ICS Trainings*	Completion Timeline
FEMA IS-100*	*Introduction to the Incident Command System*	Within 6 months of hire
FEMA IS-200*	*ICS for Single Resources and Initial Action Incidents*	Within first year
FEMA IS-700*	*National Incident Management System (NIMS)*	Within first year
FEMA IS-800*	*National Response Framework, An Introduction*	Within first year

(* - Attendance at locally or state-delivered classroom sessions of *IS-100* and *IS-200* are acceptable substitutions, as are any Montana DES classroom versions of IS-700 or IS-800).

- Demonstrate satisfactory progress towards completion of the seven FEMA on-line Professional Development Series (PDS) courses.

Course Series:	FEMA *Professional Development Series*	Completion Timeline
FEMA IS-120	*An Introduction to Exercises*	Minimum of one course

FEMA IS/G-230**	*Fundamentals of Emergency Management*	shall be completed each
FEMA IS/G-235**	*Emergency Planning*	quarter. All seven courses are
FEMA IS-240	*Leadership & Influence*	to be completed within two
FEMA IS-241	*Decision Making and Problem Solving*	years of hire.
FEMA IS-242	*Effective Communication*	
FEMA IS-244	*Developing and Managing Volunteers*	

(** - *IS 230 & IS-235 may be offered as FEMA G-230 or G-235 classroom sessions by MT DES*)

Course Series:	*Montana DES Trainings*	Completion Timeline
Montana DES	*New Coordinator's/Refresher Annual Workshop*	Within one year of hire or as negotiated with MT DES DFO.

Personnel who have completed the required initial trainings should consider incorporating these offerings into a personal training plan in consultation with the MT DES DFO.

2. Level B - Intermediate Requirements: No established timeline except for specific training plans.

The *Montana Disaster and Emergency Management Baseline* defines additional trainings for intermediate and advanced-level DES Coordinators and other emergency managers, with the intent of offering a pathway for continued professional development. While intermediate level activities are not required for participation in the EMPG Program, personnel who have completed the required *Level A* initial trainings should consider incorporating these offerings into a personal training plan in consultation with the MT DES DFO.

"ICS," "G" or "MGT" prefixes indicate a field classroom offering.

Course Series: Incident Command System (ICS) Training

FEMA ICS-300	*Intermediate ICS*
FEMA ICS-400	*Advanced ICS for Command & General Staff*

- Complete Montana DES *Agency Representative* Training

- Develop a personal training plan with Montana DES DFO. Complete additional trainings (e.g., EMI) as agreed upon with DFO and jurisdictional authorities

- Develop jurisdictional training & exercise plan

Course Series: Operational Coordination Training (Complete at least <u>one</u> of the below)

FEMA IS/G-775	*EOC Operations & Management* (available online or via field delivery)
FEMA G-191	*EOC/ICP Interface Workshop*
TEEX MGT*346*	*EOC Operations* or equivalent

Course Series: Senior Official Engagement

Senior Officials' Workshop at any level (Tribal/State/Regional/Local)
Montana DES   *Agency Representative* Training

Course Series: Public Information - complete at least one of the below:

FEMA G-289   *Introduction to Public Information*
FEMA G-290   *Basic Public Information Officer* or equivalent
MT DES   *Social Media Workshops*

Course Series: Exercise Design - complete at least one of the below:

FEMA E/L-146   *Homeland Security Exercise & Evaluation Program (HSEEP) Course*
MT DES *HSEEP*   Workshop

Course Series: EOC Management Courses – complete at least one of the below*:*

FEMA IS-775   *EOC Operations & Management*
FEMA G-775   *EOC Operations & Management*
FEMA G-191   *EOC/IMT Interface*
TEEX MGT346   *EOC Operations* or equivalent

- One *HSEEP Workshop* or FEMA E/L-146 *HSEEP Course*

- Attend or participate in a *Senior Official Workshop* at any level (local, regional, state, Tribal)

3: Level C – Advanced Requirements: No established timeline

While advanced level activities are not required for participation in the EMPG Program, personnel who have completed the suggested *Level B* intermediate trainings should consider incorporating these offerings into a personal training plan in consultation with the MT DES DFO.

- Complete Montana DES *Agency Representative* Training

- Develop a personal training plan with your MT DES DFO. Complete additional trainings (e.g., EMI) as agreed upon with DFO and jurisdictional authorities

- Participate in at least two local or regional or state-levels exercises, and conduct at least one operations-based exercise/incident/event.

Exercise

Exercises facilitate the validation of plans and capabilities and the evaluation of progress towards a stated desired outcome. A progressive, multi-year exercise program enables organizations to participate in a series of increasingly complex exercises, with each successive exercise building upon the previous one while also taking into account prior lessons learned. Regardless of the exercise type, each exercise within the progressive series is linked to a set of common program priorities and designed to test associated core capabilities.

As per the 2016 EMPG NOFO, all EMPG funded personnel shall participate in no fewer than three exercises of any type within the Federal Fiscal year (Oct 1-Sept 30)

Exercises are to be documented using the State of Montana adopted HSEEP format. AAR/IPs will be submitted your DFO for exercise credit approval within 90 days of the exercise completion, with the exception of the last quarter of the grant year, which will require submission by November 15th. Reference: 2014 SLA - Oct 1 2014

Actual Events may fulfill one exercise requirement per fiscal year, upon approval from MT DES.
As defined by DHS/FEMA, an incident is an occurrence, natural or human-caused, that requires an emergency response to protect life or property. Incidents can include terrorist attacks, wildland and urban fires, floods, hazardous materials spills, aircraft accidents, storms, public health and medical emergencies. An event is a planned, non-emergency activity such as parades, concerts or sporting events.

In addition to meeting the operations-based exercise reporting requirements, the After Action Report for Real-World Incidents (RWI) should document that a minimum of three of the following conditions were met during the incident response:

- The jurisdiction's Principle Executive Officer or a designated representative identified in the jurisdiction's emergency management plan participated

- At a minimum, three emergency management core capabilities are tested and evaluated (one will include the jurisdiction's Operational Coordination)

- A declaration of local emergency or disaster was issued

- The emergency response involved resources from outside the jurisdiction.
  RWI may be used to meet EMPG exercise requirements only once per fiscal year
  Reference: 2014 SLA - Oct 1 2014

Exercises conducted with grant funds should test and evaluate performance towards meeting capability targets, established through the identification of a jurisdiction's core capabilities needed to address their greatest risks. Exercise priorities should align with your current TEP.

Failure to meet exercise requirements may result in additional conditions, temporary withholding of payment pending correction of the deficiency, enforcement action, even whole or partial suspension or termination of award. Reference: 2CFR 200.338

VI. Claims and Additional Costs

Claims:
1. Any sub-grantee/recipient may submit for the record their formally adopted per diem rate to the State for open and active Federal funded sub-grants. Should that local or Tribal per diem rate exceed the State of Montana per diem rate for any authorized sub-grant travel, the State will honor that <u>local or Tribal rate for reimbursement from Federal grants as long as it does not exceed the maximum Federal</u> Fiscal Year Per Diem Rates as established by the U.S. General Services Administration (http://www.gsa.gov/portal/content/104877). The State will not reimburse any requested per diem rate that exceeds the current Federal Fiscal Year Per Diem Rate.

2. MT DES will accept mileage rate reimbursements (that includes the cost of fuel and minor items within the mileage rate) for use on vehicles required for authorized EMPG purposes. MT DES does not desire to see individual gasoline or fuel receipts. Mileage logs need to be on file for verification by MT DES District Reps.

Equipment Items:

Counties and Tribes must submit an Equipment and Accountable Supplies Control Form including an Allowable Equipment List number with their regular quarterly performance report to MT DES for any authorized purchase of equipment over $5,000. Supplies over $200.00 should also be documented. MT DES District Field Officers will verify these invoices and receipts also in addition to further MT DES Technical Assistance visits.

Indirect Costs:

Per 2 CFR Part 200 Applicants may request Indirect Costs (IC) under EMPG however bear in mind that under EMPG guidance any Indirect Cost will only be reimbursed at the 50% rate. Applicants must prove that their 50% Cost share of any Indirect Cost is hard cash match with no exceptions (soft match for Indirect Cost is not allowed). If an applicant requests IC, Management and Administration (M&A) may not also be claimed under EMPG. An Applicant may request up to 10% Indirect cost with a Cost Rate Proposal and Cost Allocation Plan substantiating the IC amounts and approved by DES.

An Applicant may request ICs up to an approved rate with an Indirect Cost Certification from a Cognizant Federal Agency.
All required forms must be included in the application or in subsequent requests for information in order for Indirect Costs to be authorized.

Provide your Indirect Cost Rate as a percentage
Indirect Cost Rate Percentage
Provide the amount of funds requested for Indirect Costs
Total Amount of Indirect Costs $0.00
Total Federal Dollars* $0.00

Indirect Cost Attachment Document Required Forms

Attach your Indirect Cost Rate Proposal
Indirect Cost Rate Proposal
Attach your Indirect Cost Allocation Plan
Indirect Cost Allocation Plan
Attach your Indirect Cost Certification from a Cognizant Agency if applicable
Indirect Cost Certification

Appendices

Appendix A:

Reference Links and Definitions

Montana Code Annotated Title 10 -
http://leg.mt.gov/bills/mca_toc/10_3.htm

FY2016 EMPG Notice of Funding Opportunity (NOFO) - http://www.fema.gov/media-library-data/1427284768817-b62b93d48b12617f423c0e8fbfde562b/FY2016EMPG_NOFO.pdf

FundingMT (Grant application and reporting portal) -
https://www.fundingmt.org/logout.do

National Preparedness Goal (NPG; referred to as the Goal) –
http://www.fema.gov/national-preparedness-goal

National Preparedness System (NPS) –
http://www.fema.gov/national-preparedness-system

Mission Areas – 5 themes (Prevention, Protection, Mitigation, Response, and Recovery) identified in the National Preparedness Goal that comprise the parts of Preparedness. These five mission areas serve as an aid in organizing our national preparedness activities, and do not constrain or limit integration across mission areas and core capabilities, which by their nature are highly interdependent and applicable to any threat or hazard. These mission areas exist along a continuum, and there is a dynamic interplay between and among them and even some commonality in the core capabilities essential to each.

Prevention - Prevention includes those capabilities necessary to avoid, prevent, or stop a threatened or actual act of terrorism. It is focused on ensuring optimal preparedness to prevent an imminent terrorist attack within the United States through a collaborative investigative process. Prevention includes the intelligence, law enforcement, and homeland defense activities conducted in the event of an act of terrorism in the homeland in order to determine if follow-on attacks are planned and to thwart and/or apprehend the adversary.

Protection - Protection includes capabilities to safeguard the homeland against acts of terrorism and man-made or natural disasters. It is focused on actions to protect the citizens, residents, visitors, and critical assets, systems, and networks against the greatest risks in a manner that allows our interests, aspirations, and way of life to continue by enhancing Protection through cooperation and collaboration with all sectors of society. The Protection capabilities include, but are not limited to, critical infrastructure protection, cybersecurity, border security, immigration security, protection of key leadership and events, maritime security, transportation security, defense of agriculture and food, defense against WMD threats, and health security.

Mitigation - Mitigation includes those capabilities necessary to reduce loss of life and property by lessening the impact of disasters. It is focused on the premise that individuals, the private sector, communities, critical infrastructure, and the

Nation as a whole are made more resilient when the consequences and impacts, the duration, and the financial and human costs to respond to and recover from adverse incidents are all reduced.

Response - Response includes those capabilities necessary to save lives, protect property and the environment, and meet basic human needs after an incident has occurred. It is focused on ensuring that a community is able to effectively respond to any threat or hazard, including those with cascading effects, with an emphasis on saving and sustaining lives and stabilizing the incident, as well as rapidly meeting basic human needs, restoring basic services and community functionality, establishing a safe and secure environment, and supporting the transition to recovery.

Recovery - Recovery includes those capabilities necessary to assist communities affected by an incident in recovering effectively. It is focused on a timely restoration, strengthening, and revitalization of the infrastructure; housing; a sustainable economy; and the health, social, cultural, historic, and environmental fabric of communities affected by a catastrophic incident.

Core Capabilities - Capabilities are the means to accomplish a mission, function, or objective based on the performance of related tasks, under specified conditions, to target levels of performance. There are 32 Core Capabilities outlined in the National Preparedness Goal.

1. Planning – Systematically engage the whole community as appropriate in the development of executable strategic, operational, and/or community-based approaches to meet defined objectives.

2. Public Information & Warning – Deliver coordinated, timely, reliable and actionable information to the whole community regarding any threat or hazard, actions being taken, and the assistance being made available.

3. Operational Coordination – Establish and maintain a unified and coordinated operational structure and process, integrating all critical stakeholders and supporting the execution of Core Capabilities.

4. Forensics & Attribution – Conduct forensic analysis and attribute acts to their source (including means and methods) in an effort to prevent initial or follow-on acts and/or develop counter-options.

5. Intelligence & Information sharing – Provide timely, accurate, and actionable information by gathering, analyzing, consolidating, and sharing raw data and information, from numerous sources, among Federal, State, Tribal, local and/or private sector entities, as appropriate.

6. Interdiction & Disruption – Delay, divert, intercept, halt, apprehend or secure threats and/or hazards. Activities include detection and investigation of potential terrorist activities.

7. Screen, Search & Detection – Discover, locate and identify threats and/or hazards through active and passive surveillance and search procedures.

8. Access Control & Identity Verification- Control admittance to critical locations and systems, limiting access to authorized individuals carrying out legitimate activities.

9. Cyber Security – Protect against damage to, unauthorized use of, and/or exploitation of electronic communications systems and services and the information contained therein.

10. Physical Protective Measures – Reduce or mitigate risks by controlling movement and protecting borders, critical infrastructure, and the homeland.

11. Risk Management for Protection Programs & Activities – Identify, assess and prioritize risks prior to an event to prioritize Protection activities and investments.

12. Supply Chain Integrity & Security – Strengthen the security and resilience of the supply chain, which includes food and agricultural production, food processing facilities, laboratory surveillance, transportation, retail points, public notification, and domestic and international confidence in the US food supply.

13. Community Resilience – Recognize, understand, communicate, plan and address risks so the community can develop a set of actions to accomplish Mitigation and improve resilience.

14. Long-term Vulnerability Reduction – Build and sustain resilient systems, communities, critical infrastructure and key resources to reduce vulnerability and lessen the likelihood, severity and duration of adverse consequences.

15. Risk & Disaster Resilience Assessment – Assess risk and disaster resilience so decision makers, responders, and community members can take informed action to reduce risk and increase resilience.

16. Threats & Hazard Identification – Identify threats and hazards that occur in the geographic area, determine the frequency and magnitude, and incorporate this information into analysis and planning processes.

17. Critical Transportation – Provide transportation (including infrastructure access and accessible transportation services) for response priority objectives, including the evacuation of people and animals, and the delivery of vital response personnel, equipment and services.

18. Environmental Response/Health & Safety – Provide protective guidance, training and resources to responders and affected communities. Minimize exposure to environmental public health hazards, i.e. contaminated food, air, water, waste, debris and hazardous waste. Manage the consequences of hazardous materials release, including conducting searches of suspected sources, testing and identifying substances, identifying isolation perimeters, decontamination procedures, and the notification of proper authorities.

19. Fatality Management Services – Providing body recovery, victim identification, mortuary activities, family reunification and counseling.

20. Fire Management and Suppression- Provide structural, wildland, and specialized firefighting capabilities to manage and suppress fires of all types, kinds, and complexities while protecting the lives, property, and the environment in affected areas.

21. Mass Care Services – Provide life-sustaining services, focusing on hydration, feeding, sheltering, and family reunification.

22. Mass Search & Rescue Operations – Deliver search and rescue resources, including personnel, services, animals, and other assets to save the greatest number of endangered lives in the shortest time possible.

23. On-scene Security & Protection – Ensure a safe and secure environment for people and communities located within affected areas and all response personnel.

24. Operational Communications – Ensure timely communications in support of security, situational awareness, and operations among and between affected communities and all response personnel.

25. Public & Private Services & Resources – Provide the essential services and resources to affected populations and surrounding communities that are needed to preserve life, property, safety and security.

26. Public Health & Medical Services – Provide lifesaving medical treatment and avoid additional disease and injury by delivering targeted public health and medical support and products.

27. Situational Assessment – Provide all decision makers relevant information regarding the nature and extent of the hazard, any cascading effects and the status of the response.

28. Infrastructure Systems – Stabilize critical infrastructure functions, minimize health and safety threats, and restore systems to support a viable, resilient community. Stabilization activities include damage and safety assessments, and the repair of infrastructure for oil, gas, electric, telecommunications, drinking water, wastewater, and transportations systems.

29. Economic Recovery – Return economic and business activities to a healthy state and develop new business and employment opportunities that result in a sustainable and economically viable community.

30. Health & Social Services – Restore and improve health and social services networks to promote the resilience, independence, physical and behavioral health, and well-being of the whole community.

31. Housing – Implement housing solutions to support the needs of the whole community and contribute to its sustainability and resilience.

32. Natural & Cultural Resources – Protect natural, cultural and historic resources through preservation, conservation, rehabilitation and restoration in compliance with environmental and historical preservation laws and executive orders.

Solution Areas (POETE)

Planning - Collection and analysis of intelligence and information, and development of policies, plans, procedures, mutual aid agreements, strategies, and other publications that comply with relevant laws, regulations, and guidance necessary to perform assigned missions and tasks.

Organization - Individual teams, an overall organizational structure, and leadership at each level in the structure that comply with relevant laws, regulations, and guidance necessary to perform assigned missions and tasks.

Equipment - Major items of equipment, supplies, facilities, and systems that comply with relevant standards necessary to perform assigned missions and tasks.

Training – Formal training activities that support the enhancement or sustainment of priority core capabilities.

Exercise – Planned exercises and actual major events that provide opportunities to demonstrate, evaluate, and improve the combined capability and interoperability of the other elements to perform assigned missions and tasks to standards necessary to achieve successful outcomes.

Appendix B:

Work Plan Projects

The following examples are to be viewed as sample projects only to illustrate how to:

- Organize activities into identifiable projects
- Tie activities to core capabilities
- State a specific End State
- Detail measurable work progression of the project by Quarter

Suggestions:

1) Submit projects for specific results/products that may include any necessary Planning, Training or Exercise activities. Planning, Training and Exercises are components of completing some projects, but aren't projects on their own. Examples include EOP Update, Exercise Sheltering Plan, Resource Inventory, or Develop an Economic Recovery Plan, etc.

2) Include a project to cover the necessary day-to-day activities (i.e. networking, community interaction, grant management, research, or paperwork) necessary to manage your county's or tribes' emergency management program in your Work Plan.

3) Include at least one project to cover *possible* response or recovery work during the grant year in addition to any known recovery projects that are being funded with EMPG funds. If no event happens during a quarter, simply state such for that project in the quarterly report.

Although examples and suggestions are given, the projects you choose to work on are *your* choice based on the characteristics and needs of your communities.

Example Work Plan Project

Project Name   Update Evacuation Plan

Project Priority   3

Core Capabilities   Planning, Public Information & Warning, Critical Transportation, Public and Private Services and Resources

Objective/Endstate   Be able to safely evacuate any or all areas in the jurisdiction, including household pets, to identified safe locations, being able to account for all persons. This endeavor will include 1) elected officials being able to make the decision 2) the ability to communicate the evacuation order and instructions to the effected population 3) the logistics to perform the evacuation and 4) systems to allow coordinated accounting of people's locations.

Quarter 1 Milestones/Activities

Work with LEPC/TERC, county/tribal public works departments, private businesses, and elected officials to gather necessary information and discuss questions and concerns;

begin first draft update of existing plan. This project will be a topic at 3 consecutive LEPC/TERC meetings.

Quarter 2 Milestones/Activities

Present and refine updates to the plan at an LEPC/TERC meeting; have an approved plan by the end of second quarter; identify any people who need training and arrange for that training; start developing a table top exercise with community responders, public works, animal shelters, transportation companies and elected officials.

Quarter 3 Milestones/Activities

Complete needed training; work on acquiring assets identified as necessary; develop a drill exercise with same players.

Quarter 4 Milestones/Activities

Conduct a drill exercise with same players plus some community members; review the exercise's After Action Report/Improvement Plan and make identified corrections, additions and edits to the Evacuation Plan. Start developing a table top exercise to be held the first quarter of the next grant year to examine the plan with the new edits.

Another Example Work Plan Project

Project Name Emergency Management Program

Project Priority 2

Core Capabilities Planning, Public Information & Warning, Operational Coordination

Objective/Endstate Be able to support incident First Responders, activate the Emergency Operations Center (EOC), coordinate with the State Coordination Center (SECC), work with Elected Officials, and advise the public.

Quarter 1 Milestones/Activities

Collaborate with LEPC/TERC; correspond with partners; research and develop projects; fulfill grant compliance requirements; attend District meetings; work with elected officials; plan necessary training and exercises.

Quarter 2 Milestones/Activities

Collaborate with LEPC/TERC; correspond with partners; research and develop projects; fulfill grant compliance requirements; attend District meetings; work with elected officials; plan necessary training and exercises.
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Quarter 3 Milestones/Activities

Collaborate with LEPC/TERC; correspond with partners; research and develop projects; fulfill grant compliance requirements; attend District meetings; work with elected officials; plan necessary training and exercises.
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Quarter 4 Milestones/Activities

Collaborate with LEPC/TERC; correspond with partners; research and develop projects; fulfill grant compliance requirements; attend District meetings; work with elected officials; plan necessary training and exercises.

Another Example Work Plan Project

Project Name   Strengthen Public Information and Warning

Project Priority   4

Core Capabilities   Public Information & Warning, Situational Assessment

Objective/Endstate   Be able to distribute reliable, timely and actionable information to the whole community.

Quarter 1 Milestones/Activities

Assess what communications methods, training and equipment are necessary to inform the whole community of any threat or hazard, actions being taken, and the assistance being made available.

Quarter 2 Milestones/Activities

Review Situational Assessment and Public Information and Warning processes with Elected Officials and Communications personnel, including the Public Information Officer (PIO), and any other involved parties.

Quarter 3 Milestones/Activities

Exercise Situational Awareness and Public Information and Warning processes. Review the AAR/IP from the Exercise with Elected Officials, Communications personnel and any other involved parties in order to make any needed changes.

Quarter 4 Milestones/Activities

Start an update or development of a Communications Plan to be continued into the next grant cycle. Form the group to be involved in the planning process.

Another Example Work Plan Project

Project Name   Response and Recovery of possible events

Project Priority   1

Core Capabilities   Planning, Public Information & Warning, Operational Coordination, Mass Care, Situational Assessment, Mass Care Services

Objective/Endstate   Be able to support incident First Responders, activate the Emergency Operations Center (EOC), coordinate with the State Coordination Center (SECC), work with Elected Officials,

and support at least one shelter for the community, including people with access and functional needs and pets. Work with MT DES, FEMA and local partners on Recovery activities, such as assessing damage, completing Project Worksheets (PWs), and completing work projects in a timely manner.

Quarter 1 Milestones/Activities

Review Declaration process with Elected Officials.

Quarter 2 Milestones/Activities

Test public communications and alert systems.

Quarter 3 Milestones/Activities

Acquire assets identified as necessary. It is already known that two new computers are needed for the EOC.

Quarter 4 Milestones/Activities

Work with partners to assess damage and complete Recovery activities.

Appendix C:

SUMMARY OF ALLOWABLE AND UNALLOWABLE COSTS

Allowable / Unallowable Costs

The basic criterion for EMPG allowable costs is that they must represent necessary and essential State and local emergency management personnel and administrative expenses.

General guidance is as follows. MTDES has final authority regarding authorized expenses. **If there is any doubt or question about these lists you must call/request MTDES for pre-approval!**

1. **Personnel Compensation and Benefits**

    A. Personnel. Federal contributions for this category of expenses are limited to compensation and benefits. EMPG funds may not be used to pay personnel costs of additional staffing for disaster operations.

    B. Retirement Funds. The federal share of any payment to a retirement fund must be in a prorated amount apportioned on the basis of time worked in the Emergency Management position while it was federally assisted. The cost must be related to a particular fiscal year and be charged only while that year's funds remain available.

C. <u>Full-Time or Part-Time Status</u>. Personnel will not be funded as full-time employees under EMPG unless they are performing emergency management program elements included and identified in an approved local statement of work, are required by such projects and their job descriptions to devote full-time to emergency management, and are specifically included in the annual work plan submission. EMPG funding is allowable in the case of an individual appointed under an Office of Personnel Management (OPM) – approved merit system to a part-time position in an Emergency management agency, while at the same time holding a separate part-time position in another department or in the private sector provided the duties of the other position do not conflict with or impair the emergency management functions assigned to the individual.

D. <u>Personnel of Other Agencies</u>. Personnel compensation and benefits for an employee of a department of local government other than emergency management, including persons serving as full-time or part-time local emergency program managers, are allowable for Federal contributions under the following conditions:

1)   An acceptable current position description that includes the specific emergency management duties and functions of the employee must be on file at MTDES <u>prior to accruing costs.</u>

2)   The employee must be assigned on a regular continuing basis to emergency management duties under the official personnel system of the particular local jurisdiction.

Other State Agencies that use EMPG funds shall follow State Law personnel procedures.

E. <u>Elected Officials (full-time or part-time)</u>. Salaries paid to persons who are full-time partisan elected officials are **not allowable costs** for a federal contribution under the EMPG Program. Salaries of local Emergency Management employees who also hold a part-time elective office by appointment to fill a vacancy may be allowable for a matching contribution under the EMPG Program. It must be demonstrated that the holding of such elective office <u>does not conflict</u> with or impair performance of the Emergency management duties for which salaries are being paid. Time and attendance records must be kept to demonstrate that the costs charged to Emergency management are in accordance with time and effort spent on Emergency management activities.

2. **Travel and Transportation of Persons.** Federal contributions for costs in this category are subject to the following limitations:

A. Program Participation Required. Federal contributions are limited to expenditures of a participating political subdivision for Emergency management travel only. Travel must be approved by the Emergency Program Manager or designated official of the Emergency management agency. Travel must have been performed while in an authorized travel status as provided in the applicable travel regulations accepted by FEMA as part of the State Administrative Plan.

B. Travel by Elected or Appointed Officials. Expenditures for travel by elected or appointed officials having supervisory responsibilities for Emergency management are **not allowable costs.** This does not include travel costs incurred to attend meetings and conferences provided travel is directly related to Emergency management and complies with provisions of the FEMA-accepted travel regulations.

C. Travel or Vehicle Allowances. Federal contributions for travel or vehicle allowances, which are paid to Emergency management personnel in accordance with applicable FEMA-accepted travel regulations, are limited to actual expenses of authorized Emergency Management Performance functions/official travel. Official travel is to be substantiated by vehicle mileage records, receipts for travel, or vehicle operating expenses if necessary, or other appropriate documentation that must be retained for Technical Assistance and audit purposes.

D. Unallowable First Class. First-class air accommodations **are not allowable costs**, except as provided in OMB Circular A-87 (Office of Management and Budget, Cost Principles).

E. Common Carrier Fare or Equivalent. Air travel by other than common carrier, if a normal practice of the applicant government, is allowable only for Emergency management personnel on authorized Emergency management travel. Allowable costs shall not exceed common carrier coach fare.

F. Duty Station. For the purposes of funding travel costs, the person's duty station shall be the location specified under the terms of employment.

3. **Other Allowable EMPG Program Expenses**

This classification includes allowable costs for supplies, services, and equipment needed strictly for the administration of Emergency management to the extent that such expenditure directly supports the program and is in reasonable balance with priority program mission objectives.

The following subparagraphs cover definitions, limitations, and special considerations of some costs in this category as they are treated under the EMPG Program:

EMPG administrative expenses in the "all other category" must be approved under the principles and standards in 2 CFR 225 which superseded the previous OMB Circular A-87. These costs include, but are not limited to, the following:

A.   Administrative office and Emergency management training equipment, (including audio visual equipment).

1)   Mobile and Portable Communications Equipment. Federal contributions for mobile and portable communications equipment are allowable but limited to costs of equipment required for day-to-day Emergency management business of Emergency management agency personnel. Personnel must occupy emergency management positions listed on the current MTDES Staffing Form. Additional items not included in original package purchase such as smart phone "App's", accessories, additional car chargers, vehicle key fobs etc. **are not allowable costs.**   Fixed communication towers and their operations and maintenance costs **are not allowable costs.**

2)   Administrative Equipment. Federal contributions for administrative equipment are allowable cost but are limited to costs of office machines, furniture, and items of office equipment, including audio visual, required for administration and operation of the Emergency management office, and to costs of training equipment and supplies for use by Emergency management personnel in training other governmental personnel and volunteers with emergency responsibilities.

3)   Automatic Data Processing (ADP) Equipment. Contributions for ADP equipment and software at State and local levels are limited to the pro rata share of the ADP support of Emergency management activities. Requests for contributions for purchase or rental of ADP equipment or related devices must have prior approval of both the State and the FEMA Regional Director in accordance with OMB Circular A-87.

4)   Lease-Purchase Agreements. FEMA funds of an amount no greater than the fair market rental fees of the item, and obligation of funds may not exceed the total for the fiscal year.

B. Operation and repair of administrative equipment (including that obtained through loan or donation) are allowable costs.

C. Local newsletters and publications that deal directly with the four phases of EMPG are allowable costs.

D. Utility costs (including service call charges, telephone directory charges, and environmental or other surcharges. Recurring land line charges and equipment rental costs associated with emergency communications (including telephones) and public emergency warning systems such as sirens and Reverse 911 are allowable costs.

E. Janitorial and custodial services. Expenses for janitorial and custodial services are allowable, but are limited to housekeeping and maintenance costs of space occupied by personnel engaged in the actual administration of the Emergency Management program.

F. Rent and maintenance

   1)   Office and EOC Space. Federal contributions for rent, or for charges made in lieu of rent, may not exceed 50 percent of the prevailing rental rates for comparable space in privately owned buildings in the community. If the participating Emergency management agency has an EOC, the Emergency management staff should be located there for day-to-day administration of the program at no charge to FEMA for the space. If the EOC space is not used, FEMA should not be charged for use of other space.

   2)   Local Government Buildings. Payments for rent (or maintenance and utility charges made in lieu of rent) for space occupied by an Emergency management agency in a building owned by a local government or instrumentality thereof are allowable for Federal contributions at rates approved by the Regional Director as meeting 2 CFR 225/ OMB Circular A-87 criteria.

   3)   Federally Financed Space. Charges for space in a building constructed wholly or in part with Federal financing **are not allowable costs** if the charge is based on costs associated with the capital investment for which federal funds have already been provided. Rental charges for Emergency management office space leased from the Federal Government do not require prior FEMA approval.

G. Rental Vehicles.

1) Rent paid for temporary possession or use of vehicles used solely in administration of the Emergency management program is allowable. However, vehicles must be rented from an established firm or organization regularly engaged in the business of renting motor vehicles, and the rental payments must be in accord with the terms of the written contract. Rates must be reasonable and comparable to rates available elsewhere in the area. Rent-purchase contract costs for vehicles are not allowable under the EMPG program.

2) Car rental costs paid to local government motor pools are allowable if the charges are based on experienced rates, are fixed to recover costs, and doing so constitutes a normal practice of the applicant government.

H. Insurance and Indemnification

1) Insurance Costs. Allowable insurance costs under the EMPG Program are limited to payments for the following:

(a) Liability insurance covering Emergency management administrative facilities, vehicles, and equipment.

(b) General liability insurance required for protection of the political subdivision;

(c) Insurance covering administrative Emergency management facilities, vehicles, and equipment for damages caused by fire, theft, and collision, as well as water, wind, rain, snow, hail, and other natural causes; and

(d) Errors and omissions insurance, whereby if after audit, any EMPG expenditures by participating local jurisdictions are disallowed, the insurance carrier reimburses the federal Government for the loss.

2) Self-Insurance. Within the limitation expressed in subparagraph 2-15 (3) (c) (I), contributions to a self-insurance program reserved are allowable to the extent that the type of coverage, scope of coverage, and the rates and premiums would have been allowed had the insurance been purchased to cover the risks.

3) Insurance Premiums. Allowable cost amounts for insurance premiums are limited to the pro rata share of premiums paid for coverage during the current federal fiscal year.

4) <u>Uninsured Losses</u>. Actual losses which could have been covered by acceptable insurance (through an approved self-insurance program or otherwise) are unallowable unless expressly provided for in the grant agreement.

5) <u>Workmen's Compensation</u>. Reimbursement is allowable for payment of workmen's compensation claims paid in accordance with State law in each fiscal year, but only if specifically approved in the grant agreement. Reimbursement is limited to an amount not exceeding the rates and premiums for comparable insurance protection from commercial insurance companies. Reimbursement applies only to Emergency management positions for the fiscal year.

6) <u>Loaned or Donated Items</u>. Costs of insurance for loaned or donated items **are not allowable costs.**

I. Meetings and Conferences.

1) Personnel. Federal contributions for costs of attending meetings and conferences are limited to expenditures of the participating political subdivision for Emergency management personnel occupying positions on the applicable MTDES Staffing approved by the State as part of the annual submission.

2) Technical Information Meetings. Costs are allowable when the primary purpose of the meeting is dissemination or exchange of technical information relating to Emergency management.

3) Working Lunch. Food and non-alcoholic beverages provided during meetings/conference/training sessions must meet the criteria of a working lunch as defined by the U.S. Department of Homeland Security Financial Management Guide. A working lunch is a formal and mandatory lunch necessary for all participants to have full participation in the event. <u>A working lunch must include a formal agenda with a minimum of two hours before and two hours after the working lunch for all members.</u> A working lunch that meets these criteria is an allowable cost.

J. Allowance of Indirect Costs.

In order to be allowable, indirect costs (usually a percentage of total budget costs) must be covered by a federally approved cost allocation plan. To be eligible, your federally approved indirect cost rate and cost allocation plan <u>must</u> be attached and submitted with your original EMPG application in WebGrants. Approved indirect costs

will only be reimbursed at the 50% rate per EMPG Guidance. Sub-grantees are <u>allowed and encouraged</u> to retain and use up to five percent (5%) of the amount received from the State for local Management and Administration (M&A) purposes. <u>This must be a budget line item in the sub-grantee application.</u> EMPG sub-recipients may request <u>either</u> indirect costs (with correct documentation) OR M&A <u>but not both.</u>

3. **Unallowable Expenses.** The following expenses are unallowable:

   A. <u>Unnecessary and Nonessential Expenses</u>. Costs that are clearly unnecessary or are nonessential for an effective Emergency management program are not allowed.

   B. <u>Memberships</u>. Memberships in civic, business, technical, and professional organizations are not allowable unless criteria of 2 CFR 225/OMB Circular A-87 are met. In other words, memberships must have a clear and direct connection to Emergency Management. If membership dues are billed in the name of a person holding a position of the participating political subdivision and the billing is paid for by a check drawn against the political subdivision, the membership can be considered an agency membership under the name of the person holding the position. If the person refuses to transfer it to his or her successor, the EMPG participant shall remit any portion of the federal contribution received that is still allocable to the non-expired portion of the membership.

   C. <u>EOC Rental</u>. Rent for space in federally–funded emergency operating centers (EOCs) is **not an allowed cost.**.

   D. <u>Occasionally Used Space</u>. Rent, or charges in lieu of rent, for space not used in day-today administration of the Emergency management program is **not an allowed cost.**.

   E. <u>Employees From Other Departments</u>. Rent, or charges in lieu of rent, for space occupied by employees assigned from other departments of the local government for Emergency management duties, when these personnel are located in space other than the Emergency management administrative office **is not an allowed cost**.

   F. <u>Real Property</u>. The State has determined that expenditures for purchase of land and for purchase or new construction of buildings **are not allowable costs** under EMPG.

G. Motor Vehicles. The State has determined that expenditures for purchase of vehicles **are not allowable costs** under EMPG due to funding restrictions, however the State will consider the lease of motor vehicles as an eligible cost.

H. Costs Funded Under Other Programs. All costs otherwise eligible for Federal financial contributions under other Federal programs or Federal grants, except administrative expenses incurred in conduct of normal Emergency management activities and not part of an approved application **are not allowable costs** under EMPG.

I. Federally Donated Property. Costs of acquisition, transportation, installation, or rehabilitation of property obtained by donation from a federal source under the Federal Property and Administrative Services Act or other federal authority **are not allowable costs.**

J. Benefits for Volunteers. Costs of liability insurance, accident or health benefits insurance, workmen's compensation, and other personnel benefits for volunteer and emergency workers **are not allowable costs**.

K. Prepayments. Prepayments, except normal amounts for subscriptions to periodicals, rent, utility charges, and insurance premiums. Any billing that contains a claim for prepayment for more than 12 months, except for those cited in the previous sentence, must be prorated to charge the appropriate fiscal year in which those costs were incurred.

L. Fiscal Arrangements. Interest on borrowings (however represented), bond discounts, costs of financing and refinancing operations, and related legal and professional fees **are not allowable costs**.

M. Bad Debts. Bad-debt losses arising from uncontrollable accounts and other claims, and related costs **are not allowable costs**.

N. Contingency Funds. Contributions to a contingency reserve or any similar provision for unforeseen events **are not allowable costs.**

O. Entertainment. Expenditures for entertainment, including amusements, social activities, and related incidental costs such as meals, beverages, lodging, rentals, transportation, and gratuities **are not allowable costs**.

P.   Fines and Penalties. Fines and penalties, including costs resulting from violations of or failure to comply with Federal, State, and local laws and regulations **are not allowable costs**.

Q.   Equipment Purchase. The State has determined that expenditures for purchases of equipment, except administrative equipment allowable under as indicated above **are not allowable costs**.

R.   Advertising. Costs of promotional advertising for Emergency management **are not allowable costs.** Note the difference between public education and outreach which is an allowable cost.

S.   Convict Labor. Costs of convict labor, including compensation, gratuities, meals, or other benefits for prisoners **are not allowable costs**.

T.   Alternatively Compensated Work. Personnel compensation and benefits for performance of work for which the individual receives other compensation from federal funds **are not allowable costs**.

U.   General Executive Salary. Salaries and expenses of the chief executive of a political subdivision **are not allowable costs**. These are considered costs of general local government.

V.   Legislator's Salaries. Salaries and other expenses of members of government bodies such as county commissioners, the city council, school board, etc., whether incurred for the purpose of legislation or executive direction **are not allowable costs**.

W.   Emergency Services Compensation. Any portion of compensation or benefits for dispatchers, communicators, or other personnel who are required to be on assigned duty shifts at specific locations to perform police, fire, or other first-responder functions, even though some functions related solely to Emergency management are performed during these periods **are not allowable costs**.

X.   Equipment Operation. Costs of operation of equipment not used for Emergency management administrative use **are not allowable costs**.

Y.   Uninsured Losses and Federally Supported Property. Actual losses that could have been covered by permissible insurance, through an approved self-insurance program or otherwise, and losses with regard to property on loan from, or donated by, the Federal government **are not allowable costs**.

Z. <u>Travel and Per Diem Expenses</u>. Travel and per diem expenses for students attending schools operated by FEMA or expenses reimbursed by another agency **are not allowable costs**.

AA. <u>Costs Supported Under Other Federal Programs</u>. Costs eligible under another federal program, even if only partially recovered there under, unless specifically allowable under Federal law for financial assistance under more than one Federal matching fund program **are not allowable costs**.

BB. <u>Contributions and Donations</u>. Contributions and donations are specified as unallowable by 2 CFR 225/OMB A-87.
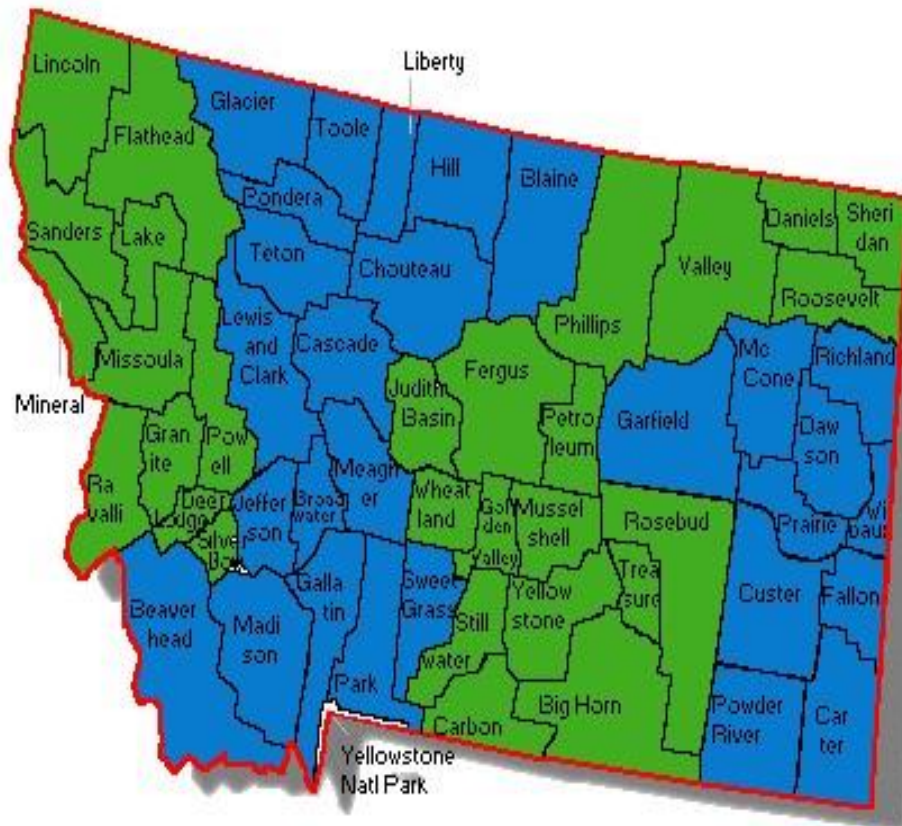
Source: diymaps.net (c)

Appendix F:

Grants Bureau Points of Contact

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Districts 2, 3, 4	Districts 1, 5, 6
	All State Agencies

District 2	District 3	District 4	District 1	District 5	District 6
Blackfeet Tribe	Beaverhead	Carter	Deer Lodge	Big Horn	Daniels
Blaine	Broadwater	Custer	Flathead	Carbon	Fergus
Cascade	Gallatin	Dawson	Granite	Crow Tribe	Fort Peck
Chouteau	Jefferson	Fallon	Lake	Golden Valley	Judith Basin
Fort Belknap	L&C	Garfield	Lincoln	Musselshell	Petroleum
Glacier	Madison	McCone	Mineral	Rosebud	Phillips
Hill	Meagher	Powder River	Missoula	Stillwater	Roosevelt
Liberty	Park	Prairie	Powell	Treasure	Sheridan
Pondera	Sweet Grass	Richland	Ravalli	Wheatland	Valley
Teton		Wibaux	Sanders	Yellowstone	
Toole			Silver Bow		